TRANSPARENCY RECORD

Minister of Finance Formal Response

Absence of Advice or Analysis on Bank Lending Practices Affecting Pre-1940s / Older Housing Stock

Hon Nicola Willis | Response dated 3 July 2026 | OIA received 3 July 2026

1. Purpose of this Record

This document records the formal Official Information Act response from the Minister of Finance, Hon Nicola Willis, to a request concerning the impact of bank lending criteria and risk assessments on pre-1940s and older housing stock in New Zealand.

It is published as a primary-source transparency record. It sits alongside earlier independent documentation on banking and insurance practices affecting older housing stock, the Reserve Bank of New Zealand's response to a related OIA, and the broader national pattern of limited comparative analysis of infrastructure versus managed retreat pathways.

2. The Request

The request, lodged on 3 July 2026, sought:

1. Any advice, briefings, reports or correspondence the Minister's office or the Treasury had received or produced since 2022 regarding the impact of bank lending criteria and risk assessments on pre-1940s or older housing stock.
2. Any work the Government or Treasury was currently undertaking to assess or address the effects of overly conservative or blunt bank lending practices on older but serviceable homes, particularly in relation to housing supply, affordability and market liquidity.
3. Any communications, meetings or correspondence between the Minister's office, the Treasury and the Reserve Bank of New Zealand concerning the impact of climate-related financial risk expectations and natural hazard frameworks on lending to older housing stock.
4. Any analysis or advice the Treasury had provided to the Minister regarding the broader implications of current bank lending practices on the large stock of pre-1940s homes in New Zealand.

3. The Minister's Formal Response – Key Admission

Parts 1, 2 and 4 of the request were refused under section 18(e) of the Official Information Act 1982.

The Minister stated:

> *"Neither I nor my office have located any information or analysis regarding the impact of bank lending criteria and risk assessments on pre-1940s or older housing stock in New Zealand, including any analysis or advice provided by the Treasury. To my knowledge, there is not currently work being undertaken in this area."*

Accordingly, these parts of the request were refused on the ground that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Part 3 (communications with the Reserve Bank) was not transferred. The Minister noted that the information is more closely connected to the functions of the Reserve Bank of New Zealand and referred the requester to the response already provided by the RBNZ under reference OIA2627_004.

4. What This Record Establishes

This response establishes, in writing from the Minister of Finance:

- That neither the Minister's office nor (to her knowledge) the Treasury holds advice, briefings, reports or analysis on the impact of current bank lending criteria and risk assessments on pre-1940s or older housing stock.
- That, to the Minister's knowledge, no work is currently being undertaken in her office or by Treasury specifically to assess or address the effects of these lending practices on older but serviceable homes, housing supply, affordability or market liquidity.
- That the Minister has referred the climate-related financial risk / natural hazard lending aspect to the Reserve Bank's existing response rather than transferring or releasing further material from her office.

5. Context

New Zealand has a high proportion of older housing stock relative to many OECD peers. Independent documentation has previously recorded concerns that some bank lending practices apply relatively blunt criteria to older properties (including those that remain insurable and structurally serviceable), with potential effects on market liquidity, first-home buyer access and the ability of existing owners to refinance or sell.

A related Official Information Act request to the Reserve Bank of New Zealand (OIA2627_004) produced a response that did not identify specific guidance or data on the scale of declined or restricted lending on older or hazard-noted properties. The Banking Ombudsman Scheme has also indicated that its role is focused on individual complaints rather than systemic reviews of industry lending practices.

The Minister of Finance's response adds a further formal statement that the central economic and fiscal policy office holds no dedicated analysis of these effects and is not currently undertaking work on the issue.

6. What This Record Does Not Establish

- That bank lending practices are necessarily inappropriate or that any particular decline decision was wrong.
- The motives of any bank, regulator or official.
- That the information must exist elsewhere and is being withheld. The Minister has stated that it does not exist or cannot be found after reasonable efforts.

7. Public Interest

The treatment of older housing stock by lenders has implications for housing supply, affordability, market liquidity and the financial position of a large cohort of homeowners. Where the Minister of Finance's office confirms that it holds no analysis of these effects and is not currently working on the issue, that confirmation itself is a matter of public interest.

This record is published so that the Minister's formal statement sits on the public record alongside the related Reserve Bank response and earlier independent documentation of banking and insurance practices affecting older properties.

8. Source Document

Letter from Hon Nicola Willis, Minister of Finance, to Jared White, dated 3 July 2026, responding to Official Information Act request received 3 July 2026 concerning bank lending practices on older housing stock.

Related records: Reserve Bank of New Zealand OIA response OIA2627_004; Banking Ombudsman Scheme correspondence on systemic lending patterns; independent briefings on banking and insurance practices affecting older housing stock (July 2026).

— End of Record —

Independent researcher | Public interest documentation | August 2026